## IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS EL PASO DIVISION

In Re:	§	
DHC REALTY, LLC,	0	-30977-HCM
Debtor.	§ § §	
DHC REALTY, LLC, CHOWAIKI HOLDINGS, LLC, EL PASO DHC ENTERPRISES, LLC, EL PASO DHC ENTERPRISES FAR EAST, LLC, EL PASO DHC ENTERPRISES WEST, LLC, and DAVID CHOWAIKI,		
Plaintiffs,	§ §	
v.	§ Adversary	No. 12-03012-HCM
ARMANDO ARMENDARIZ,	\$ \$ \$	
YVETTE ARMENDARIZ,		
and HECTOR ARMENDARIZ,	§ § §	
Defendants.	§	

## PLAINTIFFS' DESIGNATION OF TESTIFYING EXPERTS

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Comes now, Chowaiki Holdings, LLC, et al., the Plaintiffs herein, and file this their Designation of Testifying Experts in conformity with the Court's September 6, 2012 Scheduling Order entered in this matter, and would respectfully show the Court the following:

At trial, Plaintiffs expect to call the following testifying experts in order to present their case:

Leon Ernest Gluck
 National Security Consultants, LLC
 2507 East Yandell
 El Paso, Texas 79903
 Phone: 915-544-8787

Fax: 915-544-5366

Mr. Gluck is a security and management expert with multiple years of experience in bar/restaurant operations, security, and operational issues. Mr. Gluck will testify about the investigation into the operations of the three Fuddruckers restaurants operated under the umbrella of Chowaiki Holdings, LLC, the misconduct of the Defendants determined from the investigation, the evidence supporting the conclusions drawn, various violations of law implicated by Defendants' conduct, and related issues. Mr. Gluck has prepared a report which is being produced to Defendants' legal counsel simultaneously with this Designation of Testifying Experts.

b. Douglas A. Little, C.P.A. C.V.A.
Little, Roberts & Company, P.C.
1200 Golden Key Circle, Suite 340
El Paso, Texas 79925

Phone: 915-591-4495 FAX: 915-591-4497

Mr. Little has reviewed the Plaintiffs' books and records, gathered and analyzed available documents, interviewed personnel, and performed financial and other analysis in order to provide an opinion on the range of reasonable damages incurred by Plaintiffs as a result of Defendants' misconduct. Mr. Little has prepared an expert's report which is being produced to Defendants' legal counsel simultaneously with this Designation of Testifying Experts.

c. Corey W. Haugland James & Haugland, P.C. 609 Montana Avenue El Paso, Texas 79902 Phone: 915-532-3911

FAX: 915-541-6440

Mr. Haugland will testify at trial about the reasonable and necessary attorney's fees incurred by Plaintiffs in taking this case to trial and obtaining judgment against the Defendants. Mr. Haugland's testimony will rely upon the firm's historical fee statements prepared in relation to the services provided by the firm in this case. Mr. Haugland will also testify about the reasonable and necessary attorneys fees anticipated to be incurred by Plaintiffs in the event of an appeal by the Defendants from the judgment of the Court. Mr. Haugland has prepared a report which is being produced to Defendants' legal counsel simultaneously with this Designation of Testifying Experts.

Respectfully submitted,

JAMES & HAUGLAND, P.C.

P.O. Box 1770

El Paso, Texas 79949-1770

Phone: 915-532-3911 FAX: (915) 541-6440

By:

Corey W. Haugland State Bar No. 09234200

Jamie T. Wall

State Bar No. 24028200 Attorney for Plaintiffs

## **CERTIFICATE OF SERVICE**

I, Corey W. Haugland, hereby certify that on the 30th day of November, 2012, I electronically filed the foregoing Plaintiffs' Designation of Testifying Experts with the Clerk of the Court using the CM/ECF System, which will give notice of the filing of this instrument to:

Christopher R. Johnston Firth ♦ Johnston ♦ Martinez 415 N. Mesa, Suite 300 El Paso, Texas 79901

Sidney J. Diamond 3800 N. Mesa, Suite B-2 El Paso, Texas 79902

Corey W. Haugland